

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CSX TRANSPORTATION, INC.

500 Water Street

Jacksonville, FL 32202-4423

Plaintiff

v.

PORT ERIE PLASTICS, INC.

909 Troupe Road

Harborcreek, PA 16421

Defendant.

CIVIL ACTION

CASE NO. 05-139 Erie

MOTION FOR ADMISSION *PRO HAC VICE*

NOW, counsel for the plaintiff, Janssen & Keenan, P.C., by and through Jeffrey D. Cohen, Esquire, as counsel of record for the Plaintiff, CSX Transportation Company, hereby moves for *Pro Hac Vice* admission of counsel pursuant to United States District Court Middle District Rule 83.2.1 and in support thereof avers as follows:

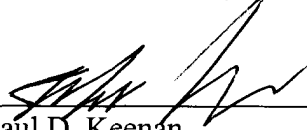
1. That the undersigned is counsel of record for the plaintiff and hereby moves for admission of Charles L. Howard, Esquire of the law firm of Janssen, & Keenan P.C. as counsel for the plaintiff..
2. Mr. Howard (Pennsylvania State Bar No. 55775) is an attorney regularly admitted to practice in the courts of the Commonwealth of Pennsylvania and has good standing therein. He is also admitted to practice in United States District Court for the Eastern District of Pennsylvania and the United States Circuit Court of Appeals for the Third Circuit. (See the attached Affidavit of Mr. Howard attached hereto and made a part hereof as Exhibit A).
3. The plaintiff has retained the above specified counsel to represent it in the preceding matter pending before the court and unless permitted to withdraw sooner by order of

the Court, the above specified attorney will continue to represent the defendant in this proceeding until the final determination thereof and agrees to be subject to the orders of this Court and the disciplinary rules of the Bar of the Commonwealth of Pennsylvania and of the Federal Court for the Middle District of Western Pennsylvania in all respects.

4. Counsel for the defendant is unopposed to this Motion for Pro Hac Vice Admission of Mr. Howard

WHEREFORE, the undersigned prays that this motion be granted and enter an Order approving Pro Hac Vice Admission of Mr. Howard.

Respectfully submitted,



Paul D. Keenan
Jeffrey D. Cohen
JANSSEN KEENAN, P.C.
One Commerce Square
2005 Market Street, Suite 2050
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Attorneys for Plaintiff
CSX Transportation, Inc.

Dated: August 1, 2005

LAW OFFICES

JANSSEN & KEENAN P.C.

CHARLES L. HOWARD
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ONE COMMERCE SQUARE
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2005 MARKET STREET
PHILADELPHIA, PA 19103

(FAX) 215-665-8887

August 2, 2005

VIA FEDERAL EXPRESS

Mr. Robert V. Barth, Jr.
Clerk of Court
U.S. Courthouse
17 South Park Row
Erie, PA 16501

Re: CSX Transportation, Inc. v. Port Erie Plastics
U.S. District Court for the Western District of Pennsylvania,
No. 05-139 Erie
Our File No. 1326.071

Dear Mr. Barth:

Enclosed please find the following:

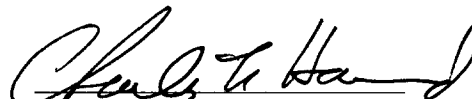
- An original and one copy of Motion for Admission Pro Hac Vice;
- Affidavit of Charles L. Howard
- Proposed Order
- A disc containing the above in .pdf format; and
- A check in the amount of \$40.00 in payment of the required filing fee.

Kindly file the original Motion with the Court and forward a time-stamped copy to me in the self-addressed stamped envelope enclosed for your convenience. Thank you for your assistance and attention to this matter.

Sincerely yours,

JANSSEN & KEENAN P.C.

By:


Charles L. Howard

CLH:jl
Enclosures